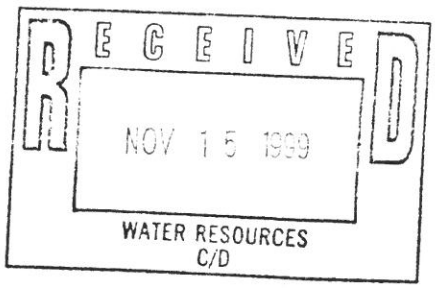
SPECIAL METALS CORPORATION
3200 Riverside Drive
Huntington, WV 25705-1771 USA
304.526.5100 Fax: 304.526.5643
www.specialmetals.com

August 12, 1999



West Virginia 2000 303(d) Stream List
WV Division of Environmental Protection
Office of Water Resources
1201 Greenbrier Street
Charleston, WV 25311
Attn: Steve Stutler

Dear Sir:

Special Metals Corporation is pleased to submit information for the 2000 West Virginia Office of Water Resources 303(d) list of water quality impaired streams in the state. Based on the enclosed comments we respectfully request Pats Branch be removed from the West Virginia Office of Water Resources 303(d) list. We welcome a re-evaluation in order to re-examine the supposed detriment to the benthologic or aquatic life of Pats Branch.

If you have any questions regarding this matter please contact me at (304) 526-5688.

Sincerely,

C. E. Peters

C. E. Peters
Safety, Health &
Environmental Engineer

COMMENTS OF SPECIAL METALS CORPORATION, INCO ALLOYS HUNTINGTON FACILITY ON THE 2000 303(d) LIST

I. Introduction

Inco Alloys Inc. located in Huntington West Virginia is owned and operated by Special Metals Corporation. The core business at the Huntington facility is nickel based metal alloy manufacturing. The standard industrial classification (SIC) code is 3356 (rolling, drawing, and extruding of nonferrous metals). Pats Branch is a very small stream that flows beneath Inco Alloys property within a six-foot diameter concrete pipe. Pats Branch is also listed in the "Primary Waterbody List" as a stream contaminated with fluoride and copper pollutants. The streams listed "use affected" for copper is "aquatic life" and for fluoride is "human health". Because a small portion of the facilities stormwater discharges to Pats Branch, it appears beneficial for the company to provide stream pollutant information to West Virginia State DEP.

II. Past Sampling History

To recount past reporting to the state DEP on Pats Branch water quality, the only stream sample data (from July 1, 1999 to the present) to analytically detect copper pollutant above the water quality standards limits were samples taken between March 1995 and September 1995. These analyses were submitted in accordance to our tailings impoundment permit requirements. Enclosed is a table summarizing the past data. Since the first quarter of 1996, the water quality samples analysis for Pats Branch have been below the Water Quality Standard Limits for the copper and fluoride pollutants.

III. 1999 Pollutant Study

In an effort to gain additional evidence of proof of these pollutant levels, our company conducted a sampling campaign of Pats Branch from March through September 1999. Grab samples were collected from the flowing segment of the stream at a point just prior to the stream entering a six-foot diameter concrete pipe that passes beneath our property. The enclosed photos depict Pats Branch from its origin, the Dietz Hollow LandFill area, to its destination, the Guyandotte River. The photo's inserted red line indicates Pats Branch location and direction of flow. The inserted red stars indicate the grab sample location for the past data and also for this reported pollutant study. Samples were collected on a frequency of every two weeks or twice per month. A separate sample was collected each for copper and fluoride. The copper sample was preserved with nitric acid and the fluoride sample received no preservative per protocol. Each sample was transferred on the same date as collected and accompanied by a chain-of-custody record to CT&E Environmental Services Inc, 1258 Greenbrier Street, Charleston, WV. A table summarizing the sample results is attached. Also attached is letter from CT&E Environmental Services Inc. describing the quality control/quality assurance measures taken to insure data accuracy.

IV. Review of Facts Towards Removing Pats Branch from the 303(d) list of Water Quality Impaired Streams.

- The Dietz Hollow landfill area contributes to Pats Branch original run-off source. Historical pollutant data indicates the values have been below the water Quality Standard limits since the landfill closed in 1995. (See Table)

- The 1999 pollutant study for fluoride and copper in Pats Branch did not detect pollution levels above the water Quality Standard limits. Furthermore, the copper analysis was always below the detection value of 20 ug/l. (See Table)

- The Pats Branch stream carries runoff from the Dietz Hollow/Guyandotte area to the Guyandotte River. The streams low flow typically ranges from approximately three to ten gallons per minute during dry weather, and with high flows greater than one hundred gallons per minute during storm events.

- Although the 1999 pollutant study was conducted during a designated "extreme drought" period, the stream was never observed in a no flow or dry condition.

- Because of the drought conditions, the 1999-study period may be considered the worst-case scenario pollutant value condition.

- The Dietze Hollow Land Fill was closed and capped in 1995.

- While passing beneath our property, Pats Branch flows approximately 25 feet below ground level and within a six-foot diameter concrete pipe. Our only direct contribution (point source) to Pats Branch is our permitted stormwater outfall "001".

- There are no state or federal regulations regarding aquatic life standards or an objective method for evaluation.

INCO ALLOYS "a SPECIAL METALS COMPANY"
PATS BRANCH STREAM DATA

Date	Total Copper ug/l	Fluoride mg/l	Flow (GPM)	Last Rain Date	Amount
05/12/99	< 20	1.5	5	5/6/99	0.26
05/27/99	< 20	1.1	5	5/23/99	0.6
06/10/99	< 20	1.4	5	"	"
06/17/99	< 20	1.2	8	6/14/99	0.31
07/07/99	< 20	1.4	2.5	6/28/99	0.76
08/06/99	< 20	1.4	8	7/30/99	0.76
08/20/99	< 20	1.8	5	8/17/99	0.14
09/28/99	< 20	1.8	3	9/20/99	0.35
AVERAGE	< 20	1.45	5.1875		
Three standard deviation Upper Control Limit	< 20	2.153562			
ater Quality Standard Avg. Daily Limit	23	1.4			
Water Quality Standard Max. Daily Limit	46	2.8			

INCO ALLOYS, Pats Branch Data

Date:	Fluoride mg/l			Copper ug/l			Hardness mg/l	Flow CFM
Mar-95	1.0			90			190	3.3
Jun-95	0.77			50			240	33.4
Sep-95	1.5			150			270	0.13
Dec-95	2.8		<	10			310	0.8
Mar-96	0.88		<	10			200	3.5
Jun-96	0.84			10			212	9.4
Aug-96	0.89			10			230	10.7
Dec-96		BACK			WATER	NO SAMPLE		
Mar-97		BACK			WATER	NO SAMPLE		
Jun-97		BACK			WATER	NO SAMPLE		
Sep-97	1.2		<	20			260	1.0
Dec-97	1.2	BACK	<	20	WATER	NO SAMPLE	310	1.0
Mar-98		BACK			WATER	NO SAMPLE		
Jun-98		BACK			WATER	NO SAMPLE		
Sep-98		BACK			WATER	NO SAMPLE		
Mar-99	0.76	BACK	<	20	WATER	NO SAMPLE	190	13.3
AVERAGE	1.184			39.0			241.2	
AVG+2SX'	2.4121947			132.0710601			332.0468797	
STD(X)	0.61409735			46.53553003			45.42343986	

CT&E Environmental Services Inc.
Environmental Laboratory Services

1258 Greenbrier Street
Charleston, WV 25311
Tel: (304) 346-0725
Fax: (304) 346-0761

Eugene Peters
Special Metals, Inc.
P.O. Box 1958
Guyan River Road
Huntington, WV 25705
11/11/99

In reference to our telephone conversation of 11/09/99 to follow are the Quality Control procedures taken with the fluoride and copper analyses. This applies to all 1999 samples for the "Pat's Branch" site.

The fluoride analysis is started each day with a four point calibration. Then a method blank is analyzed to insure the system and reagents are free of contaminates at the LOQ (Limit of Quantitation). Then an LCS (Laboratory Control Sample) of spiked reagent water is analyzed and must meet acceptance recovery criteria. Also each daily batch, of up to twenty samples, contains an MS/MSD (matrix spike / matrix spike duplicate) analyses on an analyst selected sample. The set of MS/MSD's demonstrate recovery and precision data.....validating the batch as required by the method. Each days batch is also ended with a known spiked reagent water sample to verify the calibration is still valid.

For the copper analysis similar batch Quality Control measures are taken. Each day samples are "prepped" with a similar matrix method blank, MS/MSD, an unspiked duplicate sample and an LCS. The analytical batch has additional daily QC of a CCB & CCV (continuing calibration blank & continuing calibration verification) every ten samples and at the end of the analysis day. Also at the beginning of each analysis day a full calibration is analyzed.

This summarizes the main daily QC performed with all samples. If you have any further questions or require any further details please do not hesitate to call myself or Chip Holcolm for help. All QC and raw data can be packaged, for a fee, in various degrees of detail at your request.

Sincerely,

Richard R. Reed
Inorganic Supervisor

cc: Chip Holcolm